

ESTTA Tracking number: **ESTTA447109**

Filing date: **12/19/2011**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91198660
Party	Plaintiff Broadcom Corporation
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Submission	Other Motions/Papers
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Date	12/19/2011
Attachments	2011-12-19 - Notice of Non-Opposition.pdf (3 pages)(77848 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

Broadcom Corporation,

Opposer,

v.

Broadchip Technology Group Ltd.,

Applicant.

Opposition No.: 91198660

Subject Mark: BROADCHIP

Application No.: 77/855,572

**NOTICE OF NON-OPPOSITION TO BROADCOM CORPORATION'S MOTION TO
COMPEL INTERROGATORY RESPONSES, PRODUCTION OF DOCUMENTS, AND
ATTENDANCE AT DEPOSITIONS**

On November 23, 2011, Opposer Broadcom Corporation ("Broadcom") filed a Motion to Compel, requesting that the Board require Applicant Broadchip Technology Group Ltd. ("Applicant") to respond to Broadcom's written discovery, produce its documents, and produce its witnesses for oral deposition. Broadcom filed the Motion to resolve Applicant's months-long refusal to provide any witnesses, responses or documents whatsoever.

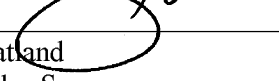
Pursuant to TMBP Section 502.02(b), any response to Broadcom's Motion was required to have been filed no later than December 13, 2011. Applicant chose not to submit any response.

Accordingly, Broadcom respectfully requests that the Board deem the Motion as conceded pursuant to 37 C.F.R. § 2.217 (“When a party fails to file a response to a motion, the Board may treat the motion as conceded”), and that the relief requested by Broadcom in its Motion be granted forthwith.¹

Respectfully submitted,

KNOBBE, MARTENS, OLSON & BEAR, LLP

Dated: December 19, 2011

By: 
Susan M. Natland
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Attorneys for Broadcom Corporation

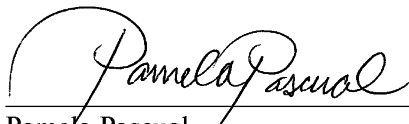
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¹ Specifically, Broadcom’s Motion requested that Applicant be ordered to: (1) provide full and complete responses to Broadcom’s First Set of Interrogatories without objection; (2) provide written responses without objection and produce the documents sought in Broadcom’s First Set of Requests for Production of Documents and Things; and (3) produce its witnesses, Mr. Dai, Ms. Geng and Applicant’s designated FRDP 30(b)(6) witness, for a timely deposition. Broadcom also requested, that upon resolution of the Motion, the Board extend discovery for a reasonable period so that Broadcom may take appropriate follow-up discovery.

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing **NOTICE OF NON-OPPOSITION TO BROADCOM CORPORATION'S MOTION TO COMPEL INTERROGATORY RESPONSES, PRODUCTION OF DOCUMENTS, AND ATTENDANCE AT DEPOSITIONS** upon Applicant by depositing a copy thereof in the United States Mail, first-class postage prepaid on December 19, 2011, addressed as follows:

Kathy Geng
Secretary
Broadchip Technology Group Ltd.
1008 Strayer Drive
San Jose, CA 95129



Pamela Pascual
Trademark Paralegal